

The request for a stay is granted.
The parties shall report within
90 days on the status of the case.
/s/ Alvin K. Hellerstein
February 10, 2022

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SABBY VOLATILITY WARRANT MASTER	:
FUND, LTD.,	: Case No. 1:19-cv-10460-NRB
	:
Plaintiff,	:
	:
v.	:
	:
PARETEUM CORPORATION, ROBERT H.	:
TURNER, EDWARD O'DONNELL, DENIS	:
MCCARTHY, VICTOR BOZZO, ROBERT	:
LIPPERT, YVES VAN SANTE, and LUIS	:
JIMENEZ-TUNON,	:
	:
Defendants.	:

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UNOPPOSED MOTION TO STAY FURTHER PROCEEDINGS

Defendant Pareteum Corporation moves this Court for an order staying further proceedings, including remaining Scheduling Order deadlines and hearings related to the same. Plaintiff does not oppose this relief. Pareteum is filing an unopposed request for the same stay in *In re Pareteum Securities Litigation*, No. 1:19-cv-09767-AKH-GWG (S.D.N.Y.).

This Court's "power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants," with the "basic goal" being "to avoid prejudice" to the parties. *Delgado v. NJ Transit Rail Operations, Inc.*, 329 F.R.D. 506, 507-08 (S.D.N.Y. 2019) (granting motion to stay all proceedings). A stay is merited here because of (1) ongoing government investigation related to the subject matter of this litigation, and (2) the precarious financial status of Pareteum, which has been exploring a range of strategic alternatives to address ongoing liquidity constraints.

See Parker v. Dawson, No. 06-CV-6191 JFB WDW, 2007 WL 2462677, at *4 (E.D.N.Y. Aug. 27, 2007) (granting stay of all proceedings due to ongoing government investigation).

Pareteum has been engaged in mediation to try to resolve this litigation but has been hampered by the two factors referenced above. The parties believe that a stay of this action will help to preserve scarce resources, including liability insurance assets, while the parties await further clarity on ongoing government investigation and the financial condition of Pareteum.

As noted above, Plaintiff does not oppose this relief. Additionally, Individual Defendants Robert H. Turner, Edward O'Donnell, Victor Bozzo, Denis McCarthy, Robert Lippert, Yves Van Sante, and Luis Jimenez-Tunon do not oppose this Motion. The parties will report to the Court on the status of this matter within ninety (90) days of entry of an Order staying the proceedings.

Dated: February 4, 2022

MCGUIREWOODS LLP

/s/ Stephen G. Foresta
Stephen G. Foresta
Jeffrey J. Chapman
McGuireWoods LLP
1251 Avenue of the Americas
20th Floor
New York, NY 10020
Telephone: (212) 548-7060
Facsimile: (212) 715-6277
sforesta@mcguirewoods.com
jchapman@mcguirewoods.com

Attorneys for Defendant Pareteum Corporation

TO: Counsel of Record (Via ECF)